



September 22, 2020

**BY ECF**

Hon. Raymond J. Dearie  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:     *United States v. Bebars Baslan, 13-Cr-220 (RJD)***

Dear Judge Dearie:

I was recently retained by Mr. Baslan, and I respectfully request permission to file a supplemental brief in support of Mr. Baslan's 28 U.S.C. § 2255 Petition.

On August 12, 2019, Mr. Baslan filed a petition pursuant to 28 U.S.C. § 2255. Two weeks later, the Court directed the government to respond, which it did on December 20, 2019. On April 27, 2020, Mr. Baslan submitted a reply, but also asked the Court to stay the proceedings until the restrictions imposed on him by the Bureau of Prisons due to the Covid-19 pandemic were eased. So far, the Court has not responded to Mr. Baslan's request, and it has not issued a ruling on the petition.

In the meantime, Mr. Baslan retained me to assist him in prosecuting his § 2255 Petition. I have reviewed the record and believe there are legitimate legal arguments to be pursued. Accordingly, given that a decision remains pending, I respectfully request permission to file a supplemental brief in support of Mr. Baslan's petition, and to do so on or before October 22, 2020.

Thank you for your consideration.

Respectfully submitted,

/s/

Florian Miedel  
*Attorney for Bebars Baslan*

Cc: AUSA Andrew Wang (by ECF)